



March 8, 2018

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

**Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 1779, Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84, and Broadband Deployment Advisory Committee, GN Docket No. 17-83**

On March 6, 2018, the undersigned, along with Mr. Matthew DeTemple, Executive Director of the Ohio Township Association; Ms. Jennifer Imo, Federal Director of the National Association of Towns and Townships; Loren Ingebretsen, Member of the Minnesota Association of Townships; Mr. Mike Koles, Executive Director of the Wisconsin Towns Association; Mr. Larry Merrill, Executive Director of the Michigan Township Association; Guy Pedersen, Executive Director of the Minnesota Association of Townships; and Mr. David Sanko, Executive Director of the Pennsylvania State Association of Township Supervisors met to discuss the above-referenced proceedings.

During the meetings, we explained that the Telecommunications Act of 1996 created a uniform framework for the relationship between local governments and telecommunications providers and that the intent of the Act was to balance protecting local decision-making authority and reducing barriers to deployment of telecommunications services. We noted that local governments have legitimate concerns with recent legislative and regulatory proposals that could change the public-private relationship to strongly favor telecommunications providers, thereby reducing the ability of local governments to ensure the safety and reliability of facilities located in the public rights-of-way. We provided several anecdotes related to the siting of telecommunications facilities and how local governments played a role in mitigating safety issues.

We also expressed concerns that local governments have far fewer resources than Federal agencies to complete reviews to build or alter telecommunication service facilities and equipment within their local jurisdiction. Specifically, we highlighted recent legislative proposals that reduce the time provided to local governments to respond to requests to build or alter wireless service facilities within their jurisdiction as compared to longer “shot clock” timeframes for the siting of telecommunications facilities on Federal lands. “Shot clock” timeframes can be

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problematic for local governments that meet normally just once a month to conduct official business.

We also discussed the lack of local government representation on the Broadband Deployment Advisory Committee, as well as its working groups.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Please contact the undersigned if you have any questions.

Sincerely,

David Hoover  
Senior Advisor  
The Ferguson Group

Cc: Claude Aiken  
Travis Litman  
Jamie Susskind